



WATER PURVEYORS ASSOCIATION OF KITSAP

Department of Ecology
Water Quality Program
AUG 10 2005

August 9, 2005

Western Washington Municipal SW Comment
Bill Moore
WA Department of Ecology
Water Quality Program
PO Box 47600
Olympia WA 98504-7600

Re: Comments On First Preliminary Draft - Proposed Municipal Stormwater NPDES General Permit for Western Washington Phase II Small Separate Stormwater Sewer Systems.

Dear Mr. Moore:

WaterPAK is an organization of the Kitsap County water purveyors where common issues are discussed and better understood. The organization includes all the cities within Kitsap County, Kitsap County Health District, and all the major water purveyors which include Kitsap PUD, Silverdale Water District, North Perry Water District, and numerous other water purveyors.

The members of WaterPAK have carefully reviewed the draft document and have discussed it with the Kitsap County Surface and Stormwater Management Program. The following comments are provided for your consideration:

SPECIAL CONDITIONS

Chapter S7.3(b)(i) - Illicit Discharges and Elimination

Page 15, lines 2 through 42 should be clarified, as follows:

- ✓ The apparent purpose of this section is to identify those discharges which are not significant contributors of pollution. The colon in line 2 should be deleted.
- ✓ Lines 5 and 6 allow the categories to be considered insignificant, but does not indicate how the enforcing agency would do so. It is recommended that lines 5 and 6 be re-written as follows:

The categories of non-stormwater discharges listed below are not considered significant contributors of pollution to the regulated small MS4, unless the NPDES permit holder agency specifically declares which item is considered a significant contributor of pollution.

By revising the wording, the listed items do not have the burden of proving that they are insignificant. The NPDES permit holder can concentrate on the larger polluters and have the latitude to include specific categories, as needed.

- ✓ Line 11 and 12 are too vague. The draft permit should indicate what “conservation programs to minimize this type of discharge are in place” are acceptable. Revised wording could be: *Lawn watering and landscape irrigation for irrigated areas of less than 10,000 square feet.*
- ✓ Lines 19 through 24 are too convoluted. For instance, who and what is used to determine if the pH has to be adjusted. To what degree is reoxygenation required? Flushing a water main automatically reoxygenates the water, but is that enough? If the phrase “controlled flows to prevent resuspension of sediments,” means do not allow the flows to create erosion – this is already a stormwater requirement. Revised the wording to *...water line flushing and discharges from potable water sources, provided that the discharges are dechlorinated.*

It is important to keep in mind that waters discharged from municipal systems already meet stringent state and federal guidelines for purity, including pH. When discharges occur, such as water quality flushing, once dechlorinated the remaining factors to be considered should be volume and velocity.

- ✓ In line 23, the wording prohibits placing any hyperchlorinated water in the MS4, even after dechlorinating. This should be in its own category, separate from water line flushing or in the category with swimming pool water.

The classification for “hyperchlorinated” water is unclear, please define. In addition, we question why potable water that was hyperchlorinated but dechlorinated cannot be discharged.

Water line flushing and repair of water leaks are essential functions to the operation of a water system. The proposed rules should not place an undue burden on the water utilities by inadvertently outlawing water discharges. Thank you for the opportunity to comment, feel call or write with any questions and/or if additional information is needed.

Yours truly,
WATERPAK



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